

Plaintiff's COPY

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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

RONALD A. RILEY, :
Plaintiff :
v. : No. 1:00-CV-00485
: (Judge Rambo)
MARTIN HORN, et al., :
Defendants :
:

FILED
HARRISBURG, PA

NOV 27 2000

MARY E. D'ANDREA, CLERK
Per *[Signature]* Deputy Clerk

**DEFENDANTS' MOTION TO EXTEND THE DISCOVERY
DEADLINE AND FOR FILING DISPOSITIVE MOTIONS**

Defendants, by their counsel, hereby request the Court to extend the deadline for discovery in this case for a period of one month until January 12, 2001, and extend the deadline for the filing of dispositive motions in this case for a period of one month until February 12, 2001. In support of this motion, defendants state as follows:

1. Plaintiff filed his complaint on March 14, 2000.
2. On June 12, 2000, defendants filed an answer to the complaint.
3. Discovery in this case closes on December 12, 2000 and all dispositive motions are to be filed on or before January 12, 2001.
4. The parties have engaged in discovery.
5. Defendants have determined a disposition of plaintiff is necessary. Therefore, defendants filed a motion for leave to take plaintiff's deposition as required by Fed.R.Civ.P. 30(a)(2). The motion and supporting brief were filed on November 8, 2000, and this Court granted the motion on November 22, 2000.

6. Undersigned Counsel has a trial in Federal Court December 11, 12, and 13, 2000 in Shawley v. Lehman, No. 3:CV-94-20-62, and will be preparing for that trial. Counsel believes that she will be unable to depose plaintiff before the close of discovery on December 12, 2000.

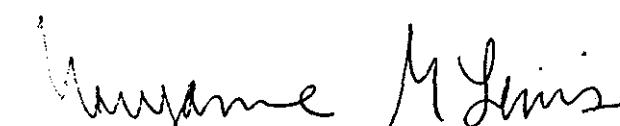
7. No prejudice will befall any party by this extension of limited duration as proposed herein.

WHEREFORE, defendants respectfully request the Court to grant an extension of time to complete discovery until January 12, 2001 and file dispositive motions on or before February 12, 2001.

Respectfully submitted,

D. MICHAEL FISHER
Attorney General

By:


MARYANNE M. LEWIS
Deputy Attorney General

SUSAN J. FORNEY
Chief Deputy Attorney General
Chief Litigation Section

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DATE: November 27, 2000

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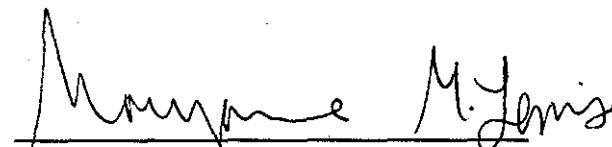
MARTIN HORN, et al.,

Defendants

CERTIFICATE OF SERVICE

I, Maryanne M. Lewis, Deputy Attorney General, hereby certify that on this date I caused to be served the foregoing Defendants' Motion to Extend The Discovery Deadline and for Filing Dispositive Motions, by depositing a copy of the same in the United States mail, postage prepaid, in Harrisburg, PA., addressed to the following:

Ronald A. Riley, #AK-8743
SCI-Huntingdon
Drawer R
1100 Pike St.
Huntingdon, PA 16654-1112


MARYANNE M. LEWIS
DEPUTY ATTORNEY GENERAL

DATE: November 27, 2000